

Nayar's useful method of forming extremely thick oxide layers at low temperatures makes no mention of obtaining uniform thicknesses. Instead, the Nayar article states that the thickness data is an average of at least 12 measurements<sup>1</sup>. Applicants submit that if Nayar had found high thickness uniformity (such as Applicants' <3% uniformity), the Nayar article would have reported the achievement. Applicants believe that artisans using the Nayar article's method might be able to produce thicker layers at a low temperature than they could using Applicants' method<sup>2</sup>. However, there is no evidence that the Nayar article's useful method creates uniformly thick layers—to which Applicants' claims are limited.

Applicants submit that the claims are patentable over the cited reference because the reference does not suggest the claimed invention to one of ordinary skill in the art. Applicants therefore respectfully request allowance of independent claim 18 and its dependents.

3. The Office Action rejected claim 1 under 35 U.S.C. § 103 as being unpatentable over Fujishiro '571 in combination with the Nayar article and Choquette *et al.* (Choquette '687).

Applicants arguments for claim 18 above are equally applicable to claim 1, and are repeated here by reference.

Claim 1's limitations also include "providing a partially completed integrated circuit on a semiconductor substrate with a clean, **atomically flat, silicon** surface". Choquette '687 teaches a useful process for removing surface contaminants such as C, Si and O, from substrates of the gallium arsenide or indium phosphide families. Applicants have studied Choquette '687 and have not found where it teaches a method of forming an atomically flat Si surface. Applicants submit that ordinary artisans would not expect a method to remove Si from a GaAs surface would be useful to form the claimed atomically flat, silicon surface. As such, obviousness has not been established.

Applicants also disagree with Examiner's assertion that ordinary artisans would be clearly motivated to provide an atomically flat surface.

Applicants submit that the claims are patentable over the cited reference because the reference does not suggest the claimed invention to one of ordinary skill in the art. Applicants therefore respectfully request allowance of independent claim 1 and its dependents.

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<sup>1</sup> See p. 206, line 3.

<sup>2</sup> Compare Fig. 2 of the Nayar article with Applicants' Fig 3.

4. Applicants have added claims 23 - 25 to claim a patentable subrange of Applicants' invention. Specification support is found at the bottom of page 8. Applicants note that the Nayar article's useful method recites a typical breakdown field equal to about 4 MV/cm.<sup>3</sup>

Applicants believe that the application is in condition for allowance. If Examiner has any further comments or suggestions, Applicants respectfully request that Examiner contact the undersigned in order to expeditiously resolve any outstanding issues.

Respectfully submitted,



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<sup>3</sup> See p. 206, 5 lines below Fig. 3.